

Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com

James Lin (SBN 310440)
jlin@goodwinlaw.com

GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com

Shane Brun (SBN 179079)
sbrun@goodwinlaw.com

Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com

Hayes P. Hyde (SBN 308031)
hhyde@goodwinlaw.com

GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, California 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com

GOODWIN PROCTER LLP
601 S. Figueroa Street, 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

Attorneys for Defendant: Otto Trucking LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE
ISO DEFENDANT OTTO TRUCKING
LLC'S MOTION FOR A SEPARATE
TRIAL**

Date: October 3, 2017
Time: 8 a.m.
Courtroom: 8, 19th Floor
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Defendant Otto Trucking LLC's Motion for a Separate Trial
2. [Proposed] Order Granting Defendant Otto Trucking LLC's Motion for a Separate Trial
3. Proof of Service

1 I, Neel Chatterjee, declare as follows:

2 1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for
3 Defendant Otto Trucking LLC ("Otto Trucking"). I make this declaration based upon matters
4 within my own personal knowledge and, if called as a witness, I could and would competently
5 testify to the matters set forth herein. I make this declaration in support of Otto Trucking's
6 Motion for a Separate Trial.

7 2. On September 14, 2017, Otto Trucking produced 980 documents pursuant to the
8 Court's order on the Stroz Report. Otto Trucking produced a privilege log the next day,
9 September 15, 2017. Otto Trucking's final production, 10 password-protected documents that
10 Otto Trucking was only recently able to unlock, was completed on September 25, 2017. Otto
11 Trucking believes it has no further outstanding discovery obligations, and has not been contacted
12 by Waymo's counsel regarding any outstanding discovery obligations.

13 3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the deposition
14 transcript of Michael J. Wagner, dated September 22, 2017.

15 4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the
16 September 20, 2017 hearing transcript in the above-captioned matter.

17 5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of Plaintiff
18 Waymo LLC's Supplemental Objections and Responses to Otto Trucking, LLC's [sic]
19 Interrogatory Nos. 1-9, dated August 24, 2017.

20 6. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff Waymo LLC's
21 Corrected Supplemental Initial Disclosures, dated June 22, 2017.

22
23 I declare under penalty of perjury under the laws of the United States that the foregoing is
24 true and correct. Executed this 26th day of September, 2017 in Menlo Park, California.

25
26 /s/ Neel Chatterjee
27 NEEL CHATTERJEE
28